



Gulf Landing LLC  
1301 McKinney  
Suite 700  
Houston, TX 77010

270362

December 11, 2003

Commander Mark Prescott  
U.S. Coast Guard  
Staff Symbol: G-MSO-2  
2100 Second Street, S.W.  
Washington, DC 20593-0001

USCG-2004-16860-15

RE: Supplemental Information to  
Gulf Landing LLC Deepwater Port License Application  
Filed November 3, 2003

Dear Commander Prescott:

Gulf Landing LLC (Gulf Landing) is in receipt of your letter dated December 2, 2003 that, among other things, describes information requirements that need to be submitted before Gulf Landing's deepwater port application can be deemed "complete".

The letter references an issue raised by the NOAA Fisheries regarding site-specific information on the entrainment mortality of eggs and larvae of marine fishery species. In order to address this issue, the letter recommends the following three actions be taken by Gulf Landing:

1. Examine the NOAA SEAMAP data set which may contain pertinent information required to complete the environmental review;
2. Gulf Landing should address what information is readily available with regard to depth-specific data including a qualitatively discussion on the issues and problems associated with timely collection of such data; and,
3. Gulf Landing should discuss its environmental monitoring program, which would provide information relevant to this issue.

The letter indicates that the above-referenced information will be necessary in order for the application to be deemed complete.

In response to the first two items, Gulf Landing is enclosing a document entitled "Appendix D Evaluation of SEAMAP Ichthyoplankton Data (Fish Eggs and Larvae) from the Waters Around West Cameron Blocks 213 and 183". This is being provided as a supplement to Gulf Landing's Environmental Review (Volume II) and can be inserted therein. The analysis concludes that:

- Use of the SEAMAP dataset does not significantly alter the interpretation of the estimated impact on marine life from what was predicted and quantified within our Application using the Shaw 2002 dataset.
- There are limited available data sources for depth-specific analysis. Although SEAMAP data collection can include columnar sampling, the samples are not maintained in a stratified order when extracted and documented.

In response to Item 3, Gulf Landing's monitoring program, as proposed in the license application, provides the most effective response to developing a better understanding of the mortality issue. Briefly, the monitoring program will:

- Establish a baseline prior to installation and operation of the facility.
- Develop an understanding of the site specific, depth specific and species-specific ichthyoplankton data for the Gulf Landing location.
- Develop an understanding of the impingement and entrainment rates during operation.
- Develop an understanding of the actual mortality rates during operation of the installation.
- Provide input into the identification, assessment and implementation of practical. and appropriate remedial measures to reduce the impact of the facility operation on the on the environment.
- Provide input into the design and operation of the intake system to reduce ichthyoplankton impacts.

The letter also noted that Gulf Landing did not specifically identify a fabrication site and that failure to do so may lead to a bifurcation of the EIS process. Gulf Landing continues to review fabrication yard locations and is not prepared to isolate on one location at this time. Gulf Landing's internal review process includes environmental sensitivity and environmental impacts as part of the selection criteria that will be provided once a final determination is made. The current screening of potential sites is presented in Table 2.5 of the Environmental Review. During the EIS process we are prepared to discuss the specific details of the potential fabrication sites and the key environmental issues associated with each of these locations.

Gulf Landing appreciates the U.S. Coast Guard forwarding all comments raised by the various participating federal agencies. Gulf Landing is developing a process to address the concerns raised and would like to discuss the process with you at your convenience.

In closing, Gulf Landing appreciates the complimentary nature of your letter and the Gulf Landing Team looks forward to working with you through the application process.

Respectfully submitted,

Larry Jensen  
Regulatory Manager  
Gulf Landing LLC  
1301 McKinney, Suite 700  
Houston, TX 77010  
Phone: (713) 230-3134  
Fax: (713) 265-3134  
Email: ljensen@shell-gt.com

Enclosure: Gulf Landing Environmental Report – Appendix D Evaluation Of SEAMAP Ichthyoplankton Data (Fish Eggs And Larvae) From The Waters Around West Cameron Blocks 213 And 183